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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

Planned Parenthood Mar Monte,

Plaintiff,

vs.

Aaron Ford, in his capacity as Nevada  
Attorney General, et al.,

Defendants

Case No.: 3:85-cv-00331-ART-CSD

**PLAINTIFF'S MOTION TO  
SHORTEN TIME TO FILE  
RESPONSE AND REPLY TO  
MOTION TO STAY**

Pursuant to Local Rules of Practice for the United States District Court for the District of Nevada ("LR") IA 6-1(d), Plaintiff Planned Parenthood Mar Monte, Inc. ("Planned Parenthood Mar Monte" or "PPMM") respectfully requests to shorten the time to file a response and reply to the Motion to Stay this Court's March 31, 2025 Order on Defendants Motion for Relief from Judgment ("Motion to Stay the Rule 60(b) Decision" or "Mot. to Stay") filed simultaneously with this decision. LR IA 6-1(d)

1 provides that “[m]otions to shorten time will be granted only upon an attorney or  
2 party’s declaration describing the circumstances claimed to constitute good cause to  
3 justify shortening of time.” LR IA 6-1(d). Good cause exists for granting Plaintiff  
4 Planned Parenthood Mar Monte’s Motion to Shorten Briefing period.

5 Plaintiff seeks to shorten the briefing schedule to resolve its Motion to Stay.  
6 Plaintiff has demonstrated good cause for an expedited resolution of its Motion to  
7 Stay the Rule 60(b) Decision before SB 510’s parental notification and judicial bypass  
8 provisions go into effect on April 30, 2025. *See, e.g., Hazari v. Superior Ct. of Santa*  
9 *Clara Cnty.*, No. 21-CV-04262-JSW, 2024 WL 5440738, at \*1 (N.D. Cal. Oct. 11, 2024)  
10 (“In light of impending deadlines in this case, the [c]ourt finds good cause to grant  
11 the motion to shorten time.”); *cf. Methode Elecs., Inc. v. Infineon Techs. Corp.*, No. C  
12 99-21142 JW (RS), 2002 WL 33831643, at \*1 (N.D. Cal. Mar. 15, 2002) (finding good  
13 cause existed to grant motion to shorten time to respond to motion for protective order  
14 limiting scope of a subpoena where the response time for the subpoena was only 14  
15 days); *Ko Olina Dev., LLC v. Centex Homes*, No. CV 09-00272 DAE-LEK, 2010 WL  
16 11527416, at \*2 n.3 (D. Haw. Nov. 30, 2010) (finding good cause existed to grant  
17 motion to shorten time to hear motion where the plaintiff had to exercise its purchase  
18 rights under the option before an upcoming deadline).

19 In support of this motion, the undersigned counsel declares:

- 20 1. Presently, this Court’s decision allows these statutes to go into effect on April  
21 30, 2025. Violations of these provisions are punishable by criminal penalties  
22 set forth in NRS 442.257.
- 23 2. For the reasons set forth in Plaintiff’s Motion to Stay, the April 30, 2025  
24 deadline imposes significant legal and practical responsibilities upon Planned  
25 Parenthood Mar Monte, its employees, and its patients, as well as abortion  
26 providers and their patients under the age of eighteen throughout Nevada.

1 3. For the reasons set forth in Plaintiff's Motion to Stay, these responsibilities  
2 and mandates carry significant risks, which have become more imminent as  
3 the date of effectiveness approaches.

4 4. Should the schedule set forth in the LR 7-2 govern the briefing of this motion,  
5 the events and harms that the underlying Motion to Stay seeks to prevent will  
6 occur by virtue of the briefing schedule in place.

7 5. Plaintiff seeks to shorten the briefing schedule to allow for resolution of this  
8 Motion before the date which NRS 442.255 and NRS 442.2555 go into effect,  
9 and, if needed, allow Plaintiff to seek alternative relief before the Ninth Circuit  
10 Court of Appeals.

11 Good cause exists in shortening the time to respond and reply in order to allow  
12 for the resolution of the Motion to Stay before the impending April 30, 2025 deadline.  
13 The briefing schedule set forth in LR 7-2 would not allow the resolution of this motion  
14 prior to the April 30, 2025 date, when NRS 442.255 and NRS 442.2555 go into effect.  
15 Accordingly, while the underlying Motion to Stay the Rule 60(b) decision seeks to  
16 prevent the enforcement of these statutes pending the Ninth Circuit's appellate  
17 review of this Court's Order on Defendants' Motion for Relief from Judgment ("Rule  
18 60(b) Order"), ECF No. 135, the regular briefing schedule would, in effect, result in  
19 the harm that the underlying motion is attempting to prevent.

20 Because NRS 442.255 and NRS 442.2555 go into effect on April 30, 2025,  
21 Plaintiff respectfully requests that this Court shorten the time to file a response and  
22 reply to the Motion to Stay filed simultaneously with this decision to allow for  
23 resolution before the enforcement date. Plaintiff requests the following schedule:  
24 Defendants will file their Response, if any, to Plaintiff's Motion to Stay by April 21,  
25 2025, and Plaintiff will file their Reply by 9:00 am PST on April 25, 2025. In the  
26 alternative, should the Court see fit, Plaintiff requests that the Court issue an initial  
27 administrative stay of its Rule 60(b) decision to allow for full briefing and due  
28

consideration of the issues raised in the Motion to Stay while preserving the status quo pending said resolution.

Dated this 14th day of April, 2025.

**BRAVO SCHRAGER LLP**

By /s/ Bradley S. Schrager

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*Attorneys for Plaintiff,  
Planned Parenthood Mar Monte, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 14th day of April, 2025, a true and correct copy of this **PLAINTIFF'S MOTION TO SHORTEN TIME TO FILE RESPONSE AND REPLY TO MOTION TO STAY** was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

By /s/ Dannielle Fresquez  
Dannielle Fresquez, an Employee of  
BRAVO SCHRAGER LLP